

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

United States Courts
Southern District of Texas
FILED

April 15, 2025

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

**JOSE ALEXIS BAEZA-COMBALUZIER
VICENTE GARCIA, JR.**

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Criminal No. M-25-712

INDICTMENT

THE GRAND JURY CHARGES:

Count One

On or about March 28, 2025, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**JOSE ALEXIS BAEZA-COMBALUZIER
and
VICENTE GARCIA, JR.**

knowing and in reckless disregard of the fact that individuals, who were aliens, had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors to transport and move said aliens within the United States in furtherance of such violation of law, that is, from a location near McAllen, Texas, to another location near Elsa, Texas, by motor vehicle, which resulted in death.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), and 1324(a)(1)(B)(iv).

Count Two

On or about March 28, 2025, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JOSE ALEXIS BAEZA-COMBALUZIER

knowing and in reckless disregard of the fact that Elena Cataria Morale, an alien who had come to, entered, and remained in the United States in violation of law, did knowingly transport, move, attempt to transport, and attempt to move said alien within the United States in furtherance of such violation of law, that is, from a location near McAllen, Texas, to another location near Elsa, Texas, by motor vehicle, which resulted in the death of Elena Cataria Morale.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(iv).

Count Three

On or about March 28, 2025, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JOSE ALEXIS BAEZA-COMBALUZIER

knowing and in reckless disregard of the fact that J.E.T.M., an alien who had come to, entered, and remained in the United States in violation of law, did knowingly transport, move, attempt to transport, and attempt to move said alien within the United States in furtherance of such violation of law, that is, from a location near McAllen, Texas, to another location near Elsa, Texas, by motor vehicle, which resulted in the death of J.E.T.M.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(iv).

A TRUE BILL

FOREPERSON

NICHOLAS J. GANJEI
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY